

United States District Court

for the  
District of Maryland

Rcv'd by:                     

HD

Conan Jin

-v-

Adventist HealthCare

Case No. 8:24-cv-01125-PX \*SEALED\*

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Conan Jin ("Plaintiff") respectfully moves for a preliminary injunction to grant the relief sought in the original Complaint and Request for Injunction, and to clarify and fortify the necessary injunctive relief with an Order that all persons and entities (not merely restricted to Adventist HealthCare) shall withhold all documents and all information which refer to Plaintiff's September 12 - 19, 2023 hospitalization at Adventist Healthcare, even if Plaintiff's medical records are subpoenaed by a State Court.

Non-Adventist HealthCare entities, such as health insurance companies or other healthcare providers, disclosing this harmful false information to third parties, would likewise defeat the very purpose of the injunctive relief that Plaintiff is seeking.

Plaintiff submits that he meets the standards for this preliminary injunction, i.e., Plaintiff will be irreparably harmed, others will not be harmed, and there is no adequate remedy at law.

WHEREFORE, Plaintiff prays for a preliminary injunction from the Court to grant Plaintiff the relief sought in the original Complaint and Request for Injunction, the additional fortifying relief sought in this Motion, and any further relief as this Court may deem appropriate.

Respectfully Submitted,

/s/ Conan Jin

CONAN JIN

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Plaintiff

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